In response to the Office Action dated December 23, 2008, Applicants respectfully request reconsideration based on the above amendments and the following remarks. Applicants respectfully submit that the claims as presented are in condition for allowance.

Claims 1-22 were rejected under 35 U.S.C. § 101 as allegedly being non-statutory. This rejection is traversed for the following reasons. Claim 1 recites particular machines as required in *In re Bilski*. Claim 1 recites a purchasing agent user system, a network, a host system and an accounting system for tracking expenditures and account codes related to the order. These hardware elements are particular machines as they are established to perform certain tasks in the telecommunications ordering process. In the case of *In re Alappat*, 33 F.3d 1526, 31 U.S.P.Q.2d (BNA) 1545 (1994), the court reasoned that "a general purpose computer in effect becomes a special purpose computer once it is programmed to perform particular functions pursuant to instructions from program software." In the present case, at the least the accounting system of claim 1 is a particular machine or apparatus as it is programmed to perform particular functions consistent with the court decision in *In re Alappat*. Thus, claims 1-22 are tied to a particular machine and should be considered statutory.

Claims 1-22 were rejected under 35 U.S.C. § 103 as being unpatentable over Dudle in view of Pfoertner and Bergholm. This rejection is traversed for the following reasons.

Claim 1 as amended recites, *inter alia*, "transmitting the accounting data over a network and a host system to an accounting system for tracking expenditures and account codes related to the order, the accounting system for verification of the accounting data, the verification of accounting data including verifying that budgetary data and accounting fields are in an predefined format and within expected data ranges for the accounting system, the verification including validating at least one accounting code in an accounting data field." Support for this feature is found in at least paragraph [0015] of Applicants' specification. None of Dudle, Pfoertner and Bergholm teaches or suggests this feature.

Dudle is directed to a system for estimating and ordering the custom manufacture of an item such as a business form. Dudle references a corporate office including a general ledger subsystem 96 and an accounts payable subsystem 98. There is no teaching in Dudle of validating at least one accounting code in an accounting data field as recited in claim 1.

The Examiner acknowledges this and states that Dudle fails to disclose verification of accounting data.

The Examiner relies on Pfoertner as allegedly teaching this feature and cites to paragraphs [0037], [0026] and [0027] of Pfoertner. Pfoertner refers to verifying credit limits for transactions. This does not correspond to verification of an accounting code in an accounting data field. Pfoertner teaches comparing the cost of a desired service to a current budget. If the user lacks the funds, the service is denied. There is no teaching of verifying accounting codes as recited in claim 1.

Bergholm was relied upon as allegedly teaching updating an order record and resubmitting an order record, but fails to cure the deficiencies of Pfoertner discussed above. Thus, even if Dudle, Pfoertner and Bergholm are combined the elements of claim 1 do not result.

For at least the above reasons, claim 1 is patentable over Dudle in view of Pfoertner and Bergholm. Claims 2-22 variously depend from claim 1 and are patentable over Dudle in view of Pfoertner and Bergholm for at least the reasons advanced with reference to claim 1.

Further, claim 5 recites "wherein the accounting code includes a work identification and asset category code." The Examiner states that Dudle teaches such a code in column 7, line 28. It is presumed that the Examiner is relying on the paper roll identification number in Dudle. This identification number, however, is not used as part of verification as recited in claim 1. Thus, the combination of Dudle, Pfoertner and Bergholm fails to teach the elements of claim 5.

Further, claim 6 recites "wherein the accounting code includes a geographic location code and a common language location identifier." The Examiner states that Dudle teaches such a code in Figure 3. A review of Figure 3 and the associated text fails to reveal the claimed code and identifier in Dudle. Further, it is noted that when claim 6 is read in its entirety, the geographic location code and common language location identifier are used as part of verification as recited in claim 1. Thus, the combination of Dudle, Pfoertner and Bergholm fails to teach the elements of claim 6.

Further, claim 18 recites, "the project accounting code includes geographic location code, common language location identifier and a work identification and asset category code." The Examiner states that Dudle teaches such codes in Figures 1-27. A review of

these figures and the associated text fails to reveal the claimed codes and identifier in Dudle. Further, it is noted that when claim 18 is read in its entirety, the geographic location code, common language location identifier and work identification and asset category code are used as part of verification as recited in claim 1. Thus, the combination of Dudle, Pfoertner and Bergholm fails to teach the elements of claim 18.

In view of the foregoing remarks and amendments, Applicants respectfully submit that the above-identified application is now in condition for allowance. Early notification to this effect is respectfully requested.

In the event the Examiner has any questions regarding this Amendment, Applicants' attorneys respectfully request the courtesy of a telephone conference.

If there are any charges with respect to this response or otherwise, please charge them to Deposit Account 06-1130.

Respectfully submitted,

By: _____
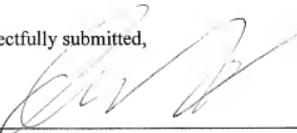
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